

EXHIBIT A

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February 28, 2006

Via FedEx

Hon. Patty Shwartz, U.S.M.J
United States District Court
District of New Jersey
U.S. Post Office and Courthouse Bldg.
50 Walnut Street, Rm. 477
Newark, NJ 07101

**Re: Mei Ying Liu and Shu Fang Chen v. Oriental Buffet, Inc., et al.
Civil Action No. 03-2406 (KSH)**

Dear Magistrate Shwartz:

As Your Honor is aware, our firm, together with the ACLU Women's Rights Project, represents Plaintiffs in this matter. By this letter Plaintiffs request leave to file a motion for partial reconsideration of your Honor's February 17, 2006 Order on Informal Application (the "Order").

In the event your Honor grants Plaintiffs leave to do so, on March 6, 2006 Plaintiffs intend to file a motion for reconsideration of certain aspects of your Honor's Order. Specifically, Plaintiffs seek partial reconsideration of your order that "with respect to Metropolitan's Interrogatory No. 14, the plaintiffs shall disclose the identities of employers for employment held while working for or after they worked for Oriental Buffet." Plaintiffs have advised us that if their current employers are informed that they are presently involved in litigation against former employers that they are likely to be terminated from their current employment. Plaintiffs have every intention of complying with the remaining aspects of your Order by March 3, 2006, including the disclosure of any of Plaintiffs' employers contemporaneous with and subsequent to their employment with Oriental Buffet, Inc. Plaintiffs seek only to shield the identity of their current employers.

The legitimate possibility that Plaintiffs will be terminated if their involvement with this lawsuit is revealed to their current employers outweighs the limited probative value of any evidence likely to be obtained from such employers, particularly considering the length time that has elapsed since Plaintiffs left the employ of Oriental Buffet, Inc. Counsel was not aware of this fear on February 16, 2006 when this matter was raised with the Court. Plaintiffs' fears constitute "newly discovered evidence" that is relevant to whether or not the identity of Plaintiffs' current

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employers should be disclosed in discovery. Harsco Corp. v. Zlotnicki, 779 F.2d 906, 909 (3d Cir. 1985).

Local Rule 7.1(g) states:

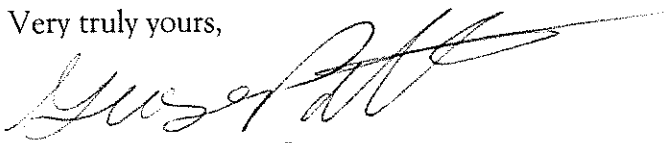
A motion for reconsideration shall be served and filed within 10 business days after the entry of the order or judgment on the original motion by the Judge or Magistrate Judge. A brief setting forth concisely the matter or controlling decisions which the party believes the Judge or Magistrate Judge has overlooked shall be filed with the Notice of Motion. Unless the Court directs otherwise, any party opposing a motion for reconsideration shall file and serve a brief in opposition within seven business days after service of the moving party's Notice of Motion and Brief. No oral argument shall be heard unless the Judge or Magistrate Judge grants the motion and specifically directs that the matter shall be argued orally.

As the deadline to file a motion for partial reconsideration, March 6, 2006, occurs after the date your Honor ordered Plaintiffs to produce the requested information, March 3, 2006, Plaintiffs hereby request that your Honor grant a limited stay of your Order pending a ruling on Plaintiffs' motion for partial reconsideration.¹ Because only three days remain before Plaintiffs are required to comply with your Honor's Order, Plaintiffs respectfully request a prompt decision on the matters raised herein, and counsel will be available at any time this week to discuss this matter with your Honor and counsel for the Defendants.

Plaintiffs are in the process of making diligent efforts to collect additional documents your Honor ordered they disclose. Some of the records must be obtained from third parties not in the control of the Plaintiffs, and accordingly may not be available by March 3, 2006. In the event that the documents are not available prior to March 3, 2006, Plaintiffs will produce the information as soon as it is in counsel's possession.

Thank you for your consideration.

Very truly yours,



George E. Patterson, Jr.

¹ Your Honor's Order was entered on February 17, 2006, thus counting ten business days from that date, not including the President's day Holiday and weekends, Plaintiffs have calculated that the requested motion for partial reconsideration is due on March 6, 2006.



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cc: Steve Mannion, Esq. (via facsimile)
Donna duBeth Gardner, Esq. (via facsimile)

